

I 1
2/26/07

February 26, 2007
File No. 20.0151605.00

United States Environmental Protection Agency
77 West Jackson Boulevard
Mail Code SE-5J
Chicago, Illinois 60604

912245



Attention: Ms. Verneta Simon

Re: NRC Incident Number 825795 Report
Updated at 8:30 AM on February 26, 2007
Rexnord Seal Operation
634 Glenn Avenue
Wheeling, Illinois

20900 Swenson Drive
Suite 150
Aukeshia
Wisconsin
53186
262-754-2560
Fax: 262-754-9711
www.gza.com

Dear Ms. Simon:

This letter provides an update to our correspondence to you dated February 16, 2007, concerning the information you requested from Ms. Janine Landow-Esser of Quarles & Brady, LLP, regarding NRC Incident Number 825795 at the Rexnord Seal Operation (Rexnord) located at 634 Glenn Avenue in Wheeling, Illinois (facility). This update is provided by GZA GeoEnvironmental, Inc. (GZA), Rexnord's Environmental Consultant, in good faith with the best information available at this time. If GZA is provided additional information that results in material differences, a new or revised report will be provided.

On Monday, February 5, 2007, at approximately 1:30 pm, a supervisor of the facility directed a maintenance employee to move a manometer from storage on the second level rack in the Stock Room to a different location. The manometer was a Meriam Instrument Company, 33KB35 manometer ("manometer"), a common device in industry used to measure pressure. The maintenance employee accessed a ladder positioned on the north side of the rack and to the west of the unit so he could determine the girth and weight of the manometer to select the proper means for removal. This maintenance employee lifted the manometer in the process with the "high end" of the manometer being on the north side of the rack and the low end facing south. The supervisor observed a liquid being released from the area of the manometer to the low rack and floor levels, which in this location and throughout the facility, is concrete. At this time, the company's presumption was that the liquid was mercury.

The supervisor immediately directed the maintenance employee to place the north end of the manometer back down on the rack. The area was immediately cordoned off and the Wheeling, Illinois fire department and the Illinois Emergency Management Agency were notified. The fire department arrived immediately and informed the facility representative that this was a relatively minor mercury release incident. In order to respond in a prudent manner, the facility nonetheless contacted SET Environmental, Inc. (SET), an abatement firm that was recommended to them by AQS Services, Inc. (AQS), the facility's waste disposal firm. AQS arrived at the facility in the late afternoon on February 5, 2007.

A representative of SET arrived at the facility at approximately 10:00 pm on February 5, 2007, and advised the facility that mercury abatement activities were necessary and that his firm

could immediately commence assessment activities. Numerous airborne mercury measurements were collected with a Lumex meter, a portable atomic absorption monitoring device.

Concurrently, Rexnord advised the only second shift employee working adjacent to the vicinity of the Stock Room to call his home and request replacement clothing and shoes prior to leaving the facility. His work clothes and shoes were collected by Rexnord for testing. The supervisor addressing the situation in the Stock Room also had clothes and shoes provided from home and his work clothes and shoes were retained for testing.



Three employees that had been in the vicinity of the Stock Room were called and asked to return to work and provide the shoes and clothing worn at work on February 5, 2007, for testing. Two returned to work and handed over clothes and shoes that had been left at Rexnord in their lockers. The third employee had left his shoes in his work area. These were provided to Rexnord for testing.

At this time, Rexnord inquired from SET whether the facility should be evacuated to which SET advised that an evacuation was not required. Rather, SET recommended the establishment of a perimeter well beyond the area of the mercury release and predicated on airborne mercury concentrations. Specifically, airborne concentration that exceed an Action Level of 0.003 milligrams of mercury per cubic meter of air (mg/m^3) or 3,000 nanograms of mercury per cubic meter of air (ng/m^3), as defined by the Agency for Toxic Substances Disease Registry (ATSDR) for commercial sites, were considered "hot zones" requiring abatement. If the mercury vapor reading was below $0.003 \text{ mg}/\text{m}^3$ or $3,000 \text{ ng}/\text{m}^3$, the surface was considered uncontaminated and the area was considered safe. These levels are several hundred times more protective than the workplace exposure limits set by the United States Department of Labor, Occupational Safety & Health Administration (OSHA) of $0.10 \text{ mg}/\text{m}^3$, which should not be exceeded at any time. None of the air borne sampling results from the facility exceeded this standard. Additionally, the National Institute for Occupational Safety and Health (NIOSH) has established an eight-hour time-weighted average (TWA) limit of $0.05 \text{ mg}/\text{m}^3$ of metallic mercury vapor.

On February 5, 2007, a protocol was established for allowing the employees to vacate the facility. As selected employees departed, airborne mercury measurements were collected at their work stations. As the employees departed the facility, they either left their shoes at the facility or were provided booties with instructions to return their shoes to the facility the next day. These employees were also advised not to transport their work shoes into their personal residences.

SET was queried on February 5, as to whether employees could return to work at the facility on Tuesday, February 6, 2007. SET advised Rexnord that operation of the facility in all locations outside of the perimeter did not provide a risk to employees. Prior to employees returning to the facility for their respective shifts on Tuesday, February 6, 2007, Rexnord posted signage on the employee entrance hallway and shop entrances to make its employees aware of the issue and provide cautionary information.

SET then continued to assess the facility and established recommended areas for vacuuming using mercury vacuums, the application of an aqueous mercury binding soap solution, the use

of absorbent media, or all these activities. On Tuesday, February 6, 2007, in order to provide for maximal efficiency of the cleanup activities, Rexnord elected to vacate the facility and cease the operations until Monday, February 12, 2007, with the exception of selected office and shipping employees working in areas that had been cleared as not being impacted. At this time, Rexnord retained GZA to provide independent testing and related services.



As part of the established protocol, it was decided that the work shoes of all employees should be tested using guidelines established by SET. Specifically, Rexnord requested that its employees place the shoes that they wore to work on Monday, February 5, 2007, and Tuesday, February 6, 2007, in plastic bags and return the shoes to the facility. For the testing of the shoes, the shoes were placed in a sealable plastic bag. The bag was then placed in a warming chamber to warm the shoes and the bag was opened to allow the headspace air within the bag to be measured by the Lumex. If testing of the air (heated) in the bag revealed a concentration below the ATSDR-recommended level of 0.01 mg/m^3 or $10,000 \text{ ng/m}^3$, the shoes were considered safe. If the air concentration was at or above this level, the established protocol required further testing of the employees' residence and vehicle, as applicable.

The protocol established for testing a residence consisted of Lumex testing of the primary means of ingress and egress, each room in the residence, the locations where work clothing was placed prior to laundering, the area where laundering occurred and the clothes washer and dryer. For the vehicles, the Lumex was also used to monitor the occupant compartment after the vehicle had been started and allowed to warm the occupant compartment, with the interior air set to circulate. For the residence and vehicle, the ATSDR residential site airborne concentration of $1,000 \text{ ng/m}^3$ was utilized to determine whether cross-contamination had occurred.

In all, 13 residences and vehicles were scheduled for testing. This testing subset consisted of those employees whose shoes tested beyond the established limit, an employee who requested such testing, and two employees who were used as a baseline. Of the 13, one employee refused to have his residence and vehicle assessed, resulting in 12 residences and vehicles being tested between February 9 and 12, 2007. In every instance, except one clothes washer in the residence of an employee who had left the facility the night of February 5, 2007, and had laundered his work clothing prior to being contacted by Rexnord, the residential ATSDR guidelines were met. This clothes washer was removed from the residence for future disposal by SET.

On Thursday, February 8, 2007, Rexnord sent a letter to employees advising them of the situation, including, among other things, the symptoms associated with short term exposure to mercury, and that employees and significant others who were pregnant should take special precautions.

On February 9, 2007, the personal items in each employee's work locker were evaluated with most items meeting the ATSDR guidelines. Any of these items that did not meet the ATSDR residential guideline were collected by SET and stored for ultimate disposal. If the personal items, clothing and/or shoes had never left the facility following the incident, residential and vehicle follow-up was deemed unnecessary.

Five employees, working in the vicinity of the release, were directed by Rexnord to have blood and urine tests for mercury. Blood and urine testing for mercury was offered to any employee who expressed a concern, with one additional employee requesting the test. These six tests were administered on or about February 6, 2007. It should be noted that neither SET nor GZA recommended this testing, however, Rexnord desired to provide the maximum protection for its employees.



On or about Tuesday, February 12, 2007, blood and urine testing for mercury was administered to an employee who was experiencing flu-like symptoms. As of February 13, 2007, seven employees had been administered blood and urine tests for mercury. The test results of all seven employees were acceptable.

On Friday, February 9, 2007, GZA collected 10 confirmatory air samples to confirm that the ATSDR commercial guidelines were met in the Office area, Assembly Rooms, Lapping Room, Sales/Engineering Office area, Men's Room, Cafeteria, Maintenance Room and Laboratory. Air samples were collected using <0.0610 microgram (μg) Hopcalite tubes with a sample flow rate of 250 milliliters per minute (cc/min). Analysis was conducted by Analytics Corporation of Ashland, Virginia using the NIOSH 6009 method. Results were all less than the laboratory detection limits which ranged from <2 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to <2.03 $\mu\text{g}/\text{m}^3$ and are provided in Attachment 1.

On Monday, February 12, 2007, the facility was reopened with all employees being provided specific update information and safe operation training regarding the incident. At this time, Rexnord again offered testing of the employees' blood and urine and their residence or vehicle. Rexnord also inquired again if any of its employees or their significant others were pregnant or potentially pregnant, with no affirmative responses.

SET continued to assess and abate the mercury based on the guidelines. SET collected materials from the Stock Room racks, wrapped the material in plastic and positioned these materials outside the facility on double impervious plastic flooring in secured tenting for future evaluation and abatement, if necessary. The materials will be individually evaluated for subsequent abatement or for proper staging for disposal at an approved disposal facility.

On Monday, February 12, 2007, eight additional confirmatory air samples to confirm that the guidelines were met were collected from the Machine Shop, Women's Room, Shipping Area, Hydropad Room, FQC Workstation Area and the Grinding Area using the method previously described. Results ranged from <1.72 $\mu\text{g}/\text{m}^3$ to <2.03 $\mu\text{g}/\text{m}^3$. The sample results are found in Attachment 2.

On Thursday, February 15, 2007, GZA collected four additional air samples in the Stock Room. These air samples were all within the ATSDR guidelines with airborne concentrations below the laboratory detection limits which ranged from <1.46 $\mu\text{g}/\text{m}^3$ to <1.77 $\mu\text{g}/\text{m}^3$ and are found in Attachment 3.

As of Friday, February 16, 2007, all areas of the facility met the ATSDR guidelines, except a small area in the Stock Room. In the Stock Room, this small area was in and around the initial area of the release in the Stock Room racks (approximately 240 square feet) and was the only location which required additional abatement. SET conducted additional abatement at this area

including the application of an epoxy coating material over a concrete seam where airborne levels, when measured with the Lumex, continued to exceed the ATSDR commercial guideline. Following the application of the epoxy coating, subsequent airborne concentrations met the ATSDR commercial guidelines.



The facility has received clearance for occupancy by SET with GZA providing further clearance for occupancy based on air sampling results. All residences tested meet the ATSDR residential guidelines. No urine or blood tests indicate any harmful exposure.

Please feel free to contact the undersigned at (262) 754-2560 with any questions, or if you require additional information.

Very truly yours,

GZA GeoEnvironmental, Inc.

A handwritten signature in black ink, appearing to read "Kim E. Anderson", is written over a horizontal line.

Kim E. Anderson, Ph.D.
Principal/Director of Toxicology,
Environmental Health and Safety

J:\151600to151699\151605\US EPA clean02-26-07.DOC

Attachments

cc: Monesh Chabria (United States Environmental Protection Agency)
Ms. Janine Landow-Esser (Quarles & Brady LLP)
Mr. Bob Uecker (Rexnord)
Ms. Patty Whaley (Rexnord)
Mr. Vince Buffa (Rexnord)
Mr. Richard Reiner (Rexnord)



ATTACHMENT 1

**Sample Results
February 9, 2007**

3 Day
Standard
TAT for IH !

5 Day
Standard
TAT for ENV !

No Charge
Liner
Pump
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Customized
Electronic
Reporting !

Dedicated
Project
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Analytics Corporation
10329 Stony Run Lane
Ashland VA 23005
Fax: 804-365-3002
Phone: 804-365-3000

TO: KIM ANDERSON
Company: TESTAMERICA ANALYTICAL TESTING CO
Fax: 1-262-754-9711
Date: Monday, February 12, 2007 1:53:14 PM
Pages: 05

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Group No. L043-001
Account No. 14709000
Report Date: 02/12/07

KIM ANDERSON
TESTAMERICA ANALYTICAL TESTING CORP
CEDAR FALLS DIVISION
704 ENTERPRISE DRIVE
CEDAR FALLS, IA 50613

**** FINAL REPORT ****

Date Received: 02/12/07
Sample Type: 11 - Air Sample(s)
Project: REXNORD, WHEELING, IL PO Number:

Analytical Results

Lab	Parameter	Volume	Amount	LOQ	Concentration	Analysis
-001 1	Samp Date: 02/09/07 OFFICE (S. WALL) Hopcalite Tube					
-	Mercury Total	30.5 L	< 0.061 ug	.061 ug	< 2 ug/M3	02/12/07
-002 2	Samp Date: 02/09/07 SO ASSEMBLY Hopcalite Tube					
-	Mercury Total	30.5 L	< 0.061 ug	.061 ug	< 2 ug/M3	02/12/07
-003 3	Samp Date: 02/09/07 LAPPING ROOM Hopcalite Tube					
-	Mercury Total	30.5 L	< 0.061 ug	.061 ug	< 2 ug/M3	02/12/07
-004 4	Samp Date: 02/09/07 ASSEMBLY Hopcalite Tube					
-	Mercury Total	30.5 L	< 0.061 ug	.061 ug	< 2 ug/M3	02/12/07
-005 5	Samp Date: 02/09/07 SALES/ENGINEERING Hopcalite Tube					
-	Mercury Total	30.0 L	< 0.061 ug	.061 ug	< 2.03 ug/M3	02/12/07
-006 6	Samp Date: 02/09/07 OFFICES Hopcalite Tube					
-	Mercury Total	30.0 L	< 0.061 ug	.061 ug	< 2.03 ug/M3	02/12/07
-007 7	Samp Date: 02/09/07 MENS ROOM Hopcalite Tube					
-	Mercury Total	30.0 L	< 0.061 ug	.061 ug	< 2.03 ug/M3	02/12/07
-008 8	Samp Date: 02/09/07 LUNCH ROOM Hopcalite Tube					
-	Mercury Total	30.0 L	< 0.061 ug	.061 ug	< 2.03 ug/M3	02/12/07
-009 9	Samp Date: 02/09/07 MAINTENANCE ROOM Hopcalite Tube					
-	Mercury Total	30.0 L	< 0.061 ug	.061 ug	< 2.03 ug/M3	02/12/07
-010 10	Samp Date: 02/09/07 LAB Hopcalite Tube					
-	Mercury Total	30.0 L	< 0.061 ug	.061 ug	< 2.03 ug/M3	02/12/07

Group No. L043-001
Account No. 14709000
Report Date: 02/12/07

KIM ANDERSON
TESTAMERICA ANALYTICAL TESTING CORP
CEDAR FALLS DIVISION
704 ENTERPRISE DRIVE
CEDAR FALLS, IA 50613

Final Report

Date Received: 02/12/07
Sample Type: 11 - Air Sample(s)
Project: REXNORD, WHEELING, IL PO Number:

Analytical Results

Lab	Parameter	Volume	Amount	LOQ	Concentration	Analysis
-011	11 Samp Date: 02/09/07		BLANK	Hopcalite Tube		
-	Mercury Total	0 L	< 0.061 ug	.061 ug	--	02/12/07

Abbreviations: ug = micrograms, mg = milligrams, mg/M3 = milligrams per cubic meter of air, g = grams, ug/M3 = micrograms per cubic meter of air, L = liters, all Volumes given in liters, ppm = parts per million, ppb = parts per billion, Areas given in square feet; ND = Not Detected; ug/wp = ug/wipe; NVG = No Volume Given. NAG = No Area Given, LOQ = Limit of Quantitation.

Group No. L043-001
Account No. 14709000
Report Date: 02/12/07

KIM ANDERSON
TESTAMERICA ANALYTICAL TESTING CORP
CEDAR FALLS DIVISION
704 ENTERPRISE DRIVE
CEDAR FALLS, IA 50613

Final Report

Summary of Analytical Methods

Compound Name	Analytical Method	Abbreviation
Mercury Total	NIOSH 6009	----

No. 18

Results provided in this report relate only to the items tested.

Attached are the results we obtained on the analysis of your samples. Any Chains-of-Custody associated with this sample group are also enclosed. Air concentrations are calculated as a convenience to the client and the overall accuracy of this result depends on both the accuracy of the air volume and the amount found by analysis. Theoretical Air Volumes for passive monitors are calculated using the sampling time submitted and the manufacturer's listed sampling rate for each compound.

For blanks and non-detects the results indicated with a '<' value represents the reporting limit for that analysis. Unless otherwise noted results are not corrected for blank values.

Unless the signature of the appropriate manager(s) appears on the final page of this report, this report should be considered PRELIMINARY and is subject to change.

We appreciate your confidence in allowing Analytics to be your testing laboratory. Any questions regarding this report can be addressed by calling our client services department (800-888-8061).

James A. Calpin, CIH
Laboratory Director

End of Report
Page 3



ATTACHMENT 2

**Sample Results
February 12, 2007**

February 14, 2007

Client:

GZA ENVIRONMENTAL, INC.
20900 Swenson Dr. Suite 150
Waukesha, WI 53186

Work Order: CQB0486
Project Name: Rexnord, Mercury Analysis
Project Number: Wheeling, IL

Attn: Kim Anderson

Date Received: 02/13/07

An executed copy of the chain of custody is also included as an addendum to this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-(800)750-2401

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
11-Machine Shop 1	CQB0486-01	02/12/07
12-R&D Area	CQB0486-02	02/12/07
13-Womens Room	CQB0486-03	02/12/07
14-Shipping	CQB0486-04	02/12/07
15-Final QC-1	CQB0486-05	02/12/07
16-Hydro Pad Rm	CQB0486-06	02/12/07
17-FQC Workstation 3	CQB0486-07	02/12/07
18-Grinding Dept. 4	CQB0486-08	02/12/07
Blank	CQB0486-09	02/12/07

Case Narrative: Analyzed by Analytics Corp. - Ashland, VA.

Wisconsin Certification Number: 999917270

Field blanks are not used in sample correction unless noted.

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Analytical Testing Corporation certifies that the analytical results contained herein apply only to the specific sample analyzed.

Approved By:



Michael K. McGee, CIH - Laboratory Director

AIHA Lab Certification Number: #101044

TestAmerica - Cedar Falls, IA
Brian C. Graettinger
Project Manager

GZA ENVIRONMENTAL, INC.
20900 Swenson Dr. Suite 150
Waukesha, WI 53186
Kim Anderson

Work Order: CQB0486
Project: Rexnord, Mercury Analysis
Project Number: Wheeling, IL

Received: 02/13/07
Reported: 02/14/07 07:42

ANALYTICAL REPORT

Analyte	Result	Data Qualifiers	Date Analyzed	Analyst	Method	Quant. Limit
Sample ID: CQB0486-01 (11-Machine Shop 1)						
Mercury	<0.0610ug/tube	<2.03 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-02 (12-R&D Area)						
Mercury	<0.0610ug/tube	<2.03 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-03 (13-Womens Room)						
Mercury	<0.0610ug/tube	<1.98 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-04 (14-Shipping)						
Mercury	<0.0610ug/tube	<1.92 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-05 (15-Final QC-1)						
Mercury	<0.0610ug/tube	<1.97 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-06 (16-Hydro Pad Rm)						
Mercury	<0.0610ug/tube	<1.72 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-07 (17-FQC Workstation 3)						
Mercury	<0.0610ug/tube	<1.75 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-08 (18-Grinding Dept. 4)						
Mercury	<0.0610ug/tube	<1.88 ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610
Sample ID: CQB0486-09 (Blank)						
Mercury	<0.0610ug/tube	---ug/m3	2/13/2007	bcg	NIOSH 6009	0.0610



ATTACHMENT 3

**Sample Results
February 15, 2007**

3 Day
Standard
TAT for IH !

5 Day
Standard
TAT for ENV !

No Charge
Laboratory
Pump
Program !

Customized
Electronic
Reporting !

Dedicated
Project
Management!



Analytics Corporation
10329 Stony Run Lane
Ashland VA 23005
Fax: 804-365-3002
Phone: 804-365-3000

TO: RUSH
Company: TESTAMERICA ANALYTICAL TESTING CO
Fax: 1-262-754-9711
Date: Friday, February 16, 2007 4:58:04 PM
Pages: 04

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Group No. L047-005
Account No. 14709000
Report Date: 02/16/07

KIM ANDERSON
TESTAMERICA ANALYTICAL TESTING CORP
CEDAR FALLS DIVISION
704 ENTERPRISE DRIVE
CEDAR FALLS, IA 50613

**** FINAL REPORT ****

Date Received: 02/16/07
Sample Type: 5 - Air Sample(s)
Project: REXNORD PO Number:

Analytical Results

Lab	Parameter	Volume	Amount	LOQ	Concentration	Analysis
-001	19-STOCKROOM 1	Samp Date: 02/15/07	Hopcalite Tube			
-	Mercury Total	36 L	< 0.061 ug	.061 ug	< 1.69 ug/M3	02/16/07
-002	20-STOCKROOM 2	Samp Date: 02/15/07	Hopcalite Tube			
-	Mercury Total	38.25 L	< 0.061 ug	.061 ug	< 1.59 ug/M3	02/16/07
-003	21-STOCKROOM 3	Samp Date: 02/15/07	Hopcalite Tube			
-	Mercury Total	34.5 L	< 0.061 ug	.061 ug	< 1.77 ug/M3	02/16/07
-004	22-STOCKROOM 4	Samp Date: 02/15/07	Hopcalite Tube			
-	Mercury Total	41.75 L	< 0.061 ug	.061 ug	< 1.46 ug/M3	02/16/07
-005	BLANK	Samp Date: 02/15/07	Hopcalite Tube			
-	Mercury Total	0 L	< 0.061 ug	.061 ug	--	02/16/07

Abbreviations: ug = micrograms, mg = milligrams, mg/M3 = milligrams per cubic meter of air, g = grams, ug/M3 = micrograms per cubic meter of air, L = liters, all Volumes given in liters, ppm = parts per million, ppb = parts per billion, Areas given in square feet; ND = Not Detected; ug/wp = ug/wipe; NVG = No Volume Given. NAG = No Area Given, LOQ = Limit of Quantitation.

Group No. L047-005
Account No. 14709000
Report Date: 02/16/07

KIM ANDERSON
TESTAMERICA ANALYTICAL TESTING CORP
CEDAR FALLS DIVISION
704 ENTERPRISE DRIVE
CEDAR FALLS, IA 50613

Final Report

Summary of Analytical Methods

Compound Name	Analytical Method	Abbreviation
Mercury Total	NIOSH 6009	----

No. 18

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James A. Calpin, CIH
Laboratory Director

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Page 2